

**EXHIBIT A**

***(Declaration of Jane Doe providing additional details  
about safety concerns and need for confidentiality)***

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JANE DOE,

Plaintiff,

vs.

JOSEPH LOMBARDO, Governor of Nevada, in  
his official capacity; AARON FORD, Attorney  
General of Nevada, in his official capacity; NYE  
COUNTY; ELKO COUNTY; STOREY  
COUNTY; WESTERN BEST, LLC; DESERT  
ROSE CLUB, LLC; HACIENDA ROOMING  
HOUSE, INC. D/B/A BELLA'S HACIENDA  
RANCH; MUSTANG RANCH  
PRODUCTIONS, LLC D/B/A MUSTANG  
RANCH LOUNGE, LLC; LEONARD  
'LANCE' GILMAN, in his official capacity; and  
LEONARD 'LANCE' GILMAN, in his  
individual capacity,

Defendants.

Case No.: 3:24-cv-00065-MMD-CSD

**DECLARATION OF JANE DOE**

1 I, Jane Doe, hereby swear, under penalty of perjury, that the matters set forth in this  
2 Declaration are true and accurate to the best of my knowledge and belief:

- 3 1. I am the Plaintiff in the above-captioned case, a resident of Nevada, and am  
4 over 18 years old.
- 5 2. I have never been convicted of a felony or a crime involving dishonesty.
- 6 3. As disclosed in the Complaint for Declaratory and Injunctive Relief filed with  
7 this Court on February 8, 2024, I was sex trafficked in legal Nevada brothel  
8 prostitution between 2017 and 2023.
- 9 4. The Defendant Counties regulating the legal brothels never screened me for sex  
10 trafficking.
- 11 5. Local law enforcement did not screen for sex trafficking or working conditions.  
12 They did not conduct brothel inspections, except to check that the prostituted  
13 women had been subjected to STI testing and had brothel license cards.
- 14 6. I was sex trafficked within legal brothel prostitution at Chicken Ranch, Desert  
15 Rose, Bella's, and Mustang Ranch.
- 16 7. While Chicken Ranch was prostituting me, the brothel took large percentages of  
17 the money I made, frequently charged me fees and fines for various infractions,  
18 controlled my movements by not allowing me to leave the premises on most  
19 days, controlled my access to money, mail, and medication, and subjected me to  
20 searches, including of my phone and email.
- 21 8. Chicken Ranch also limited my access to my own legal documents.
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- 1           9.     I was not allowed to keep my own brothel license card. Chicken Ranch kept my  
2                 Sheriff's card/license under lock and key, and I was not permitted to hold onto  
3                 them.
- 4           10.    I also was not allowed to keep my own contract.
- 5           11.    Weapons were present in all of the brothels operated by the Brothel Defendants.
- 6           12.    I dealt with violent sex buyers who cursed and threatened me in the brothels  
7                 operated by the Brothel Defendants.
- 8           13.    While Desert Rose was prostituting me, the brothel took large percentages of  
9                 the money I made, frequently charged me fees and fines for various infractions,  
10                monitored my movements, and forced me to work excessive hours – sometimes  
11                more than 72 hours per week.
- 12           14.    The pimp/sex trafficker who ran Desert Rose, Gabe Ornelas, would brandish his  
13                gun and even shoot at people. Defendant Elko County did not suspend or revoke  
14                his license even after Mr. Ornelas nearly shot one of the prostituted women in  
15                the foot in 2022, and simply warned him not to do it again.
- 16           15.    I witnessed Gabe Ornelas being violent and intimidating: he physically abused  
17                his girlfriend, bragged about paying money to Elko officials to protect the  
18                brothel, and permitted members of organized crime in the brothel.
- 19           16.    I was threatened and coerced by members of organized crime that Desert Rose  
20                permitted in the brothel.
- 21           17.    I was threatened by Gabe Ornelas, was contacted by people with gang  
22                affiliations, and received indications that I was being watched.
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- 1 18. I witnessed local law enforcement visit Desert Rose weekly, but they did not
- 2 talk to me or assess whether I was being forced, coerced, or defrauded.
- 3 19. Desert Rose bullied me when I wanted to go to the police and threatened me
- 4 with their lawyers.
- 5 20. Desert Rose required me to sign a non-disclosure agreement and agree to not
- 6 say negative things about them.
- 7 21. While Bella's was prostituting me, the brothel took large percentages of the
- 8 money I made, frequently charged me fees and fines for various infractions,
- 9 withheld my last paycheck, and controlled and tracked my movements by
- 10 locking me inside and monitoring me.
- 11 22. Bella's routinely violated licensing and other laws relating to operating brothels.
- 12 23. While Mustang Ranch was prostituting me, the brothel took large percentages
- 13 of the money I made, frequently charged me fees and fines for various
- 14 infractions, controlled my movements by not allowing me to leave the premises
- 15 on most days as well as requiring me to ask permission even to use the
- 16 bathroom, controlled my access to my personal belongings and medication, and
- 17 subjected me to searches, including of my mail, phone, and email.
- 18 24. In the initial intake interview at Mustang Ranch, I was forced to sign a non-
- 19 disclosure agreement and also a legal agreement stating that I was not being
- 20 trafficked. The Mustang Ranch employees handling the intake process laughed
- 21 about sex trafficking.
- 22 25. Mustang Ranch had an apparent agreement with the Storey County Sheriff.
- 23 Unlike the other brothels where law enforcement would usually ask for the
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1 prostituted woman's ID before giving her the brothel card, the Storey County  
2 Sheriff's Office simply wanted the piece of paper with Mustang Ranch's name  
3 on it saying the prostituted woman was employed by Mustang Ranch for  
4 prostitution. I was in and out of the Storey County Sheriff's Office in about five  
5 minutes, having been handed licenses without questions or any kind of checks.  
6 When I questioned the process, Mustang Ranch's driver told me to "stop  
7 talking."  
8

9 26. Lance Gilman actually bragged in the brothel about how he had all of Reno  
10 under his thumb.  
11

12 27. Mustang Ranch routinely violated various laws and regulations, without  
13 consequence.  
14

15 28. When Mustang Ranch realized that I was keeping track of their actions, they  
16 confiscated part of my contract copy. I was also threatened by Mustang Ranch's  
17 live-in attorney if I did not stop speaking about their exploitive practices.  
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19 29. Around Christmastime in 2019, I was verbally assaulted and kicked out in the  
20 snow by Mustang Ranch, for being late returning from vacation even though my  
21 flight was delayed due to the snow. Due to the flight delay, I did not arrive in  
22 time for Mustang Ranch's doctor to subject me to a STI examination. Another  
23 prostituted woman stood up for me and, as a result, I was put in a part of the  
24 brothel that had no running water for the bathtub or working lights, instead of  
25 being left in the snow. There was no heat in that room that night either, though  
26 Mustang Ranch turned the heat on the next morning.  
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- 1 30. Mustang Ranch kicked me out in my pajamas for trying to help another  
2 prostituted woman, and I used the last of my money to call an uber and go to a  
3 hotel. When the hotel realized my situation, they said that they had witnessed  
4 this all the time and did not charge me for the night.  
5
- 6 31. Mustang Ranch kept my final paycheck, and never paid me. They took my  
7 clothing, work items, documents, and laptop. They did not allow me to return to  
8 the brothel to retrieve anything.  
9
- 10 32. While I was in the brothels, I used a stage name instead of my legal name to try  
11 to protect myself.  
12
- 13 33. Given the hundreds of sex buyers who raped and committed other violence  
14 against me in many locations, including the area where I live now, I remain in  
15 fear for my physical safety should my name become public in this case.  
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- 17 34. At least one sex buyer has subjected me to other abuses since I left the brothels.  
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- 19 35. To the best of my knowledge, none of these persons who engaged or  
20 participated in sex trafficking me in prostitution, including the Brothel  
21 Defendants, have been prosecuted and sentenced to prison, and they remain at  
22 large.  
23
- 24 36. Accordingly, I also fear for my physical safety from my sex traffickers and their  
25 associates, especially the members of organized crime who frequented Desert  
26 Rose Brothel, should my name become public in this case.  
27
- 28 37. I would be willing to supply further evidence of these dangers, including about  
the sex buyer incident and organized crime threats, and the impact of the trauma  
on me, including medical records, for in camera review.

1 38. In addition to the physical dangers, I further fear being subjected to various  
2 forms of potentially debilitating harassment and other retaliation if my name  
3 becomes public in this case.

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5 39. Given the Brothel Defendants' crimes against me directly, their willingness to  
6 collude with other criminal actors, their collusion with government officials  
7 (including the former Government Defendants), and their threats of retaliation  
8 against me, I further fear for my physical safety as well as various forms of  
9 potentially debilitating harassment and other retaliation, should the Brothel  
10 Defendants or the former Government Defendants be able to access my identity  
11 and information without any protective order or other restrictions in place.

12  
13 40. To this day, I still suffer from the trauma and other effects of being sex  
14 trafficked, including back pain, chronic post-traumatic stress disorder, major  
15 anxiety disorder, and suicidal ideation for which I was hospitalized twice.

16  
17 41. This harm would only be compounded if my friends, other family members,  
18 neighbors, teachers, classmates, and employers – not to mention the general  
19 public – could access the sensitive, traumatizing, and humiliating details of  
20 sexual abuse and violence that I suffered.

21  
22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on October <sup>31</sup>\_\_\_\_\_, 2024.

24  
25 Jane Doe

26 \_\_\_\_\_  
JANE DOE, Plaintiff